

EXHIBIT 1

Declaration of William Hunter Campbell in Support
of Zuffa, LLC's Reply in Support of Its Motion to
Seal Plaintiffs' Reply in Support of Plaintiffs'
Motion to Certify Class and Related Materials (ECF
No. 554)

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury, on behalf of themselves and all others similarly situated.

Plaintiffs

V.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC.

Defendant

No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF W. HUNTER
CAMPBELL IN SUPPORT OF
DEFENDANT ZUFFA, LLC'S REPLY
IN SUPPORT OF ITS MOTION TO
SEAL PLAINTIFFS' REPLY IN
SUPPORT OF PLAINTIFFS'
MOTION TO CERTIFY CLASS AND
RELATED MATERIALS (ECF NO.
554)**

1 I, William Hunter Campbell, declare as follows:

2 1. I am over 21 years old. I have personal knowledge of the facts stated in this
 3 declaration and if called to testify, I could and would competently testify to these facts. I am a
 4 member in good standing of the State Bar of Nevada. I am Of Counsel to the law firm of Campbell
 5 & Williams and Chief Legal Officer (CLO) and Executive Vice-President of defendant Zuffa, LLC
 6 (“Zuffa”), d/b/a Ultimate Fighting Championship® (“UFC”). UFC is a mixed martial arts (“MMA”)
 7 promoter. Prior to beginning my work as CLO with Zuffa in 2017, I represented Zuffa as outside
 8 counsel on several matters.

9 2. I make this declaration in support of Zuffa’s Reply in Support of Its Motion to Seal
 10 Plaintiffs’ Reply in Support of Plaintiffs’ Motion to Certify Class and Related Materials (ECF No.
 11 554) (“Motion to Seal”).

12 3. Through my role as Zuffa’s CLO, as well as from my representation of Zuffa, I am
 13 familiar with Zuffa’s practice of maintaining the confidentiality of Zuffa’s financial information.
 14 Zuffa executives and employees keep financial information—including revenue and compensation
 15 information, both on an individual and aggregate level—private and confidential. Zuffa’s event-
 16 level financials, including compensation and spending information, are considered highly
 17 confidential. All of this information also constitutes highly sensitive business information that we
 18 keep private, as such information would allow competitors to gain competitive advantages over us in
 19 the marketplace, including but not limited to, allowing those competitors to have a tactical advantage
 20 over Zuffa in negotiations with venues, sponsors, athletes, and others. Public release of this
 21 information would thus cause Zuffa competitive harm.

22 4. As a private company, Zuffa does not publicly report its revenue, expense,
 23 compensation, and other financial information on a yearly, quarterly, or event-by-event basis; the
 24 only exception is that, at times, Zuffa discloses certain financial information to third-party credit
 25 rating agencies and banks.

26 5. While at Zuffa, I have engaged in multiple negotiations with athletes and have had to
 27 evaluate whether—and if—Zuffa can match or beat offers from competing foreign or domestic
 28 MMA promotions in order to sign talented MMA athletes. This involves confidential negotiations

1 with athletes and/or their representatives over the terms in Zuffa's contracts. Negotiations with
 2 athletes and their representatives, including skilled and experienced agents, managers, and attorneys,
 3 is challenging and any information regarding the amounts and benefits Zuffa is willing to offer to an
 4 athlete—in addition to information regarding Zuffa's negotiating strategy and tactics—could and
 5 would be used by competitors to gain an advantage in negotiations with such athletes.

6. Zuffa works diligently to keep its unredacted contracts with athletes—both executed
 7 and draft versions—confidential. Zuffa does this to ensure that its competitors are not simply able to
 8 copy its contracts and combine that information with other highly confidential information such as
 9 revenue, spending, and compensation information to duplicate Zuffa's successful business model.

10. Zuffa also works diligently to keep its financial planning, modeling, and related
 11 strategic documents and communications highly confidential and does not disclose these secrets and
 12 materials publicly. Any event-level revenue information that Zuffa does not publicly release—
 13 including information regarding revenue, spending and compensation trends—would allow
 14 competitors to understand Zuffa's product investment, development, and innovation strategies,
 15 thereby giving them an undue advantage.

16. Finally, athletes have asked me and other Zuffa personnel to keep their draft and final
 17 contracts, as well as compensation information, strictly confidential in the interests of their privacy
 18 or, in some cases, their safety. Consistent with athletic commission rules and applicable laws, I and
 19 others at Zuffa have made our best efforts to respect these athletes' requests.

20
 21 I declare under penalty of perjury under the laws of the United States of America that the
 22 foregoing facts are true and correct. Executed this 26th day of June, 2018 in Las Vegas, NV.
 23

24 _____ /s/ Wm. Hunter Campbell _____
 25 Wm. Hunter Campbell
 26
 27